

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of )  
Implementation of Section 621(a)(1) of )  
The Cable Communications Policy Act ) **MB Docket No. 05-311**  
Of 1984 as Amended by the Cable )  
Television Consumer Protection and )  
Competition Act of 1992 )

**COMMENTS OF WASHINGTON STATE GRANGE**

On behalf of the Washington State Grange, I am writing to emphasize the importance of the Federal Communication Commission's role in attaining fair and equitable access to cable and video services in all parts of America - rural and urban alike.

The Washington State Grange is a part of the National Grange which is America's oldest farm-based organization, with grassroots units established in 2,800 local communities in 37 states. The Washington State Grange is a non-partisan, grassroots advocacy group for rural citizens with both legislative programs and community activities. The Washington State Grange coordinates the activities of the state's 293 subordinate Granges and the 41 Pomona (county and district) Granges. Washington enjoys the distinction of having more Grangers than any other state -- currently approaching 50,000 members.

The Washington Grange believes strongly in full and fair competition in the marketplace, and the area of cable and video services is no exception. In the current regulatory environment, there are several thousand jurisdictions with various rules new entrants must follow in order to offer video services. The regulations vary from place to place, and seem to be designed to give competitors to the current cable companies' difficulty in entering each market. For the advanced services that are being offered, these unsystematic rules are out-of-date, unfair to new entrants, and ultimately prevent consumers from choosing services best suited for them and their families.

We believe that evenly balanced, fair rules and regulations will promote a more open cable market that will stimulate competitive pricing,

and ultimately give consumers more options from which to choose. There are additional benefits in the delivery of cable services in that some providers also offer various state-of-the-art, advanced telecommunications as well as cable services. For rural areas, this could further promote telecommunications parity with the more densely populated areas of the United States.

The Washington Grange believes that the FCC is empowered to standardize the existing regulatory field, with time defined local negotiating schedules, yet without removing local authority to collect fees.

Today, rural consumers are more connected than ever before in great part due to the commendable work of the FCC. The Washington Grange commends the FCC's efforts to search for fair and equitable policy decisions and we encourage the Commissioners to make reasonable changes that will allow competition in the video marketplace. The Commission should not be swayed by fundamentally anti-competitive arguments which are detrimental to rural consumers' best interests.

We urge the Commission to continue to focus on the interests of all consumers, and to especially keep in mind the needs of rural consumers during this proceeding, which will determine the future market of video and cable services in America.

Respectfully submitted,

BY: Terry Hunt  
President  
Washington State Grange

February 7, 2006